

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

EX PARTE APPLICATION OF IRAQ  
TELECOM LIMITED FOR AN  
EXPEDITED ORDER TO TAKE  
DISCOVERY PURSUANT TO 28 U.S.C. §  
1782

Applicant.

Case No. \_\_\_\_\_

**EX PARTE APPLICATION OF IRAQ TELECOM LIMITED FOR EXPEDITED  
JUDICIAL ASSISTANCE PURSUANT TO 28 U.S.C. § 1782 TO TAKE DISCOVERY  
FROM CITIBANK, N.A., HSBC BANK (USA), N.A., STANDARD CHARTERED  
INTERNATIONAL (USD) LTD., THE BANK OF NEW YORK MELLON, N.A., AND  
WELLS FARGO BANK, N.A.**

Applicant Iraq Telecom Limited (“Iraq Telecom”), pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 34, and 45, respectfully requests that this court grant an *ex parte* order in the form attached as Exhibit F to the declaration of Kristin N. Tahler (the “Tahler Declaration”) authorizing Iraq Telecom to obtain certain limited discovery<sup>1</sup> for use in pending and contemplated proceedings, including in (1) the Dubai International Financial Centre Courts (“DIFC Courts”); (2) an arbitration administered by the International Chamber of Commerce (“ICC”); and (3) an arbitration administered by the Lebanese Arbitration and Mediation Center (“LAMC”) of the Chamber of Commerce, Industry and Agriculture of Beirut and Mount-Lebanon (“CCIA-BML”). In support of this Application, Iraq Telecom submits a Memorandum of Law and attaches the sworn declarations of (1) Kristin N. Tahler; (2) Graham Kenneth Lovett; (3) Rajinder Bassi; (4) Nabil Abdel Malek; (5) Ehab Fekri Bassilios; and (6) Nicholas Bortman, with accompanying exhibits.

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<sup>1</sup> See Tahler Declaration, attached hereto as Appendix A, at Exhibits A-E (Draft Subpoenas).

Date: October 5, 2018

Respectfully submitted,

*/s/ Gabriel F. Soledad*

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